

OF COUNSEL:

James P. Rouhandeh, Esq. (*pro hac vice*)  
Brian S. Weinstein, Esq. (*pro hac vice*)  
**DAVIS POLK & WARDWELL LLP**  
450 Lexington Avenue  
New York, New York 10017  
Tel.: (212) 450-4000  
Fax: (212) 701-5800

Kevin H. Marino, Esq.  
John D. Tortorella, Esq.  
**MARINO, TORTORELLA &  
BOYLE, P.C.**  
437 Southern Boulevard  
Chatham, New Jersey 07928-1488  
Tel.: (973) 824-9300  
Fax: (973) 824-8425

*Attorneys for Defendants BT Group plc,  
Ian Livingston, Gavin E. Patterson,  
Tony Chanmugam, Nick Rose, Luis  
Alvarez, and Richard Cameron*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JAMES CHRISTIAN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BT GROUP PLC, IAN LIVINGSTON,  
GAVIN E. PATTERSON, TONY  
CHANMUGAM, NICK ROSE, LUIS  
ALVAREZ, and RICHARD CAMERON,

Defendants.

No. 2:17-cv-00497-KM-JBC

CLASS ACTION

**ORAL ARGUMENT  
REQUESTED**

**RETURN DATE:  
JANUARY 6, 2020**

**NOTICE OF MOTION TO  
DISMISS**

To: James E. Cecchi  
**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.**  
5 Becker Farm Road  
Roseland, NJ 07068

Samuel H. Rudman  
David A. Rosenfeld

Alan I. Ellman  
**ROBBINS GELLER RUDMAN &  
DOWD LLP**  
58 South Service Road, Suite 200  
Melville, NY 11747

Corey D. Holzer  
Marshall P. Dees  
**HOLZER & HOLZER, LLC**  
200 Ashford Center North, Suite 300  
Atlanta, GA 30338

*Attorneys for Plaintiffs*

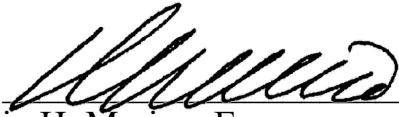
**PLEASE TAKE NOTICE** that at 9:00 a.m. on January 6, 2020, or such other time and date as set by the Court, Defendants BT Group plc, Ian Livingston, Gavin E. Patterson, Tony Channugam, Nick Rose, Luis Alvarez, and Richard Cameron will move before the Honorable Kevin McNulty, Judge of the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for entry of an Order granting Defendants' Motion to Dismiss Plaintiffs' Fourth Amended Complaint.

**PLEASE TAKE FURTHER NOTICE** that, in support of the within motion, Defendants rely upon the accompanying memorandum of law and the Declaration of James P. Rouhandeh.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is being submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 78.1(b), Defendants request oral argument on this motion.

Dated: October 4, 2019

By:   
Kevin H. Marino, Esq.  
**MARINO, TORTORELLA  
& BOYLE, P.C.**  
437 Southern Boulevard  
Chatham, New Jersey 07928-1488

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